

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 25-cv-22896-JEM**

FRIENDS OF THE EVERGLADES, INC., a Florida  
not-for-profit corporation, and CENTER FOR  
BIOLOGICAL DIVERSITY, a 501(c)(3) nonprofit  
organization,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity  
as Secretary of the UNITED STATES  
DEPARTMENT OF HOMELAND SECURITY; et  
al.;

Defendants.

**DECLARATION OF RALPH ARWOOD**

1. My name is Ralph Arwood and I make this declaration based on my personal knowledge. If called as a witness, I could and would competently testify to the facts set forth herein.
2. I am a private pilot. On Saturday, July 5, 2025, I flew over the Dade-Collier Training and Transition Airport (the "TNT Site"), which goes by the International Civil Aviation Organization code KTNT.
3. Using a GoPro HERO 13 Black camera I took several photographs of the TNT Site.

4. Attached to this declaration is report by Dr. Christopher McVoy reproducing eighteen photographs. The photographs in the report were taken by me and truly and accurately depict what they purport to show, that is, various angles of the TNT Site as it appeared on July 5, 2025. The photographs have not been altered or edited in any way.

I declare under penalty of perjury that the foregoing is true and correct and was executed on July 7, 2025, in Collier County, Florida.

  
\_\_\_\_\_  
Ralph Arwood

# Oblique Aerial Photos of Ongoing Construction at Dade Collier T&T Airport

Photographed 5 July 2025

Photos courtesy of Ralph Arwood

Text by Christopher McVoy

## **Newly Paved (Asphalted) Area**

Photo 23,  
Looking S.

Dark  
rectangle  
is new con-  
struction.



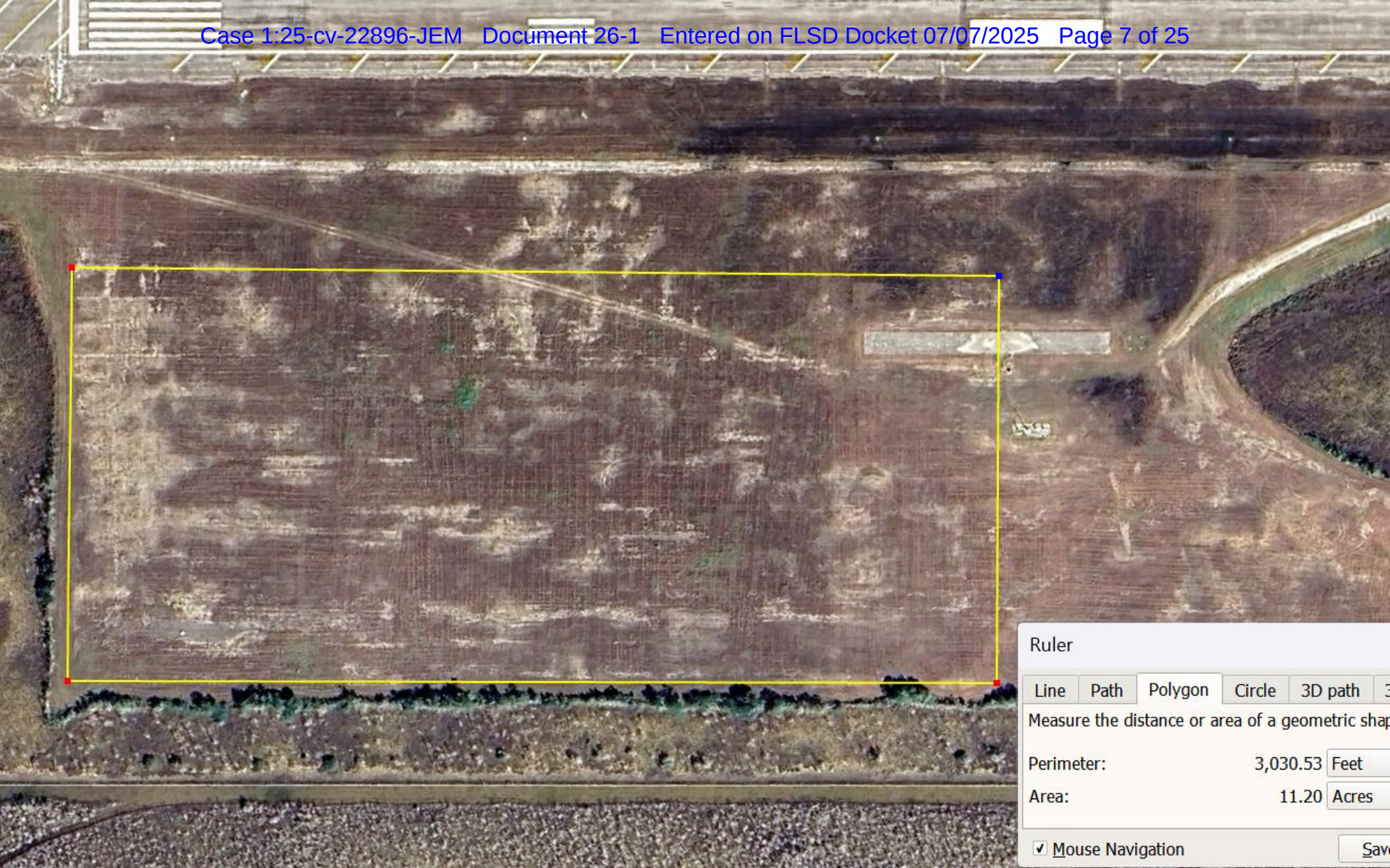




Detail of Photo 23.

Dark rectangle is new construction (compare with June 2025 Google Earth satellite imagery). Dark is almost certainly asphalt. Light sandy brown area to east and north of asphalt is newly scrapped area. Red alignment lines were used to estimate extent of assumed paved area (next slide).





Untilted, unrotated Google Earth image used to estimate area of the paved region shown in Photo 23. Alignment lines shown in previous slide were used to locate eastern and northern boundaries; vegetation rows to estimate location of southern and western boundaries. This newly paved area estimated to be **11+ acres**.

Exhibit 1



Photo 11,  
Looking W.

Dark blue-  
ish  
rectangle  
on L side is  
the newly  
asphalted  
area.







Detail of Photo 11.

Dark, blue-ish rectangle is new construction (can confirm by comparison with June 2025 Google Earth satellite imagery), almost certainly asphalt. Light sandy brown appears to be newly scrapped area.

**Detainee Area  
(on existing tarmac)**



Photo 31,  
Looking E.

Detention  
Area (Block  
of 7 white  
tents in  
LRH  
corner).





## Detail of Photo 31.

Detention Area on previously existing tarmac.

According to Incident Commander Dr. Frankie Lumm, the four long tents each hold 250 detainees for a total of 1,000.

Total site capacity as of July 5, 2025 is 1,000 detainees, 2,000 less than the stated goal of 3,000.



Photo 18,  
Looking N.

Detention  
Area and  
portion of  
employee  
housing  
(trailers).







Detail of Photo

Detention Area  
previously  
tarmac.

The light brown  
area S and E  
tarmac is new  
leveled/scrapped

Exhibit 1 12



**Employee Housing & Services Area  
(on existing taxiway tarmac)**

Photo 35,  
Looking E.

The many  
white  
structures  
on taxiway  
(N strip)  
are all  
employee  
housing  
and/or  
services.





## Detail of Photo 35.

The many white structures on taxiway (N strip) are all trailers housing employees and/or services.

The right strip is the main runway, which the Incident Commander indicated was being kept unimpeded for use as runway.



Photo 3,  
Looking W.

Main  
runway  
(left) and  
employee  
housing  
(right).





Detail of Photo  
3, Looking W.

Employee  
housing  
(numerous  
white blocks)  
on previously  
existing  
taxiway.



## **Several Areas of New Road Construction/Asphalting**





Detail of Photo 3, Looking W. New road, turnaround and asphaltting of same at east end of taxiway.





Detail of Photo 11, Looking W. Two areas of new road and asphaltting.





Detail of Photo 18, Looking N. White diagonal line on LHS is new road, not yet asphalted.



Detail of Photo 22, looking S. Western portions and “Y” split of newly paved entrance road from main N-S entrance road.





Detail of Photo 23, looking S. Western portion of newly paved entrance road from main N-S entrance road.